

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	<b>CC Docket No. 94-102</b>
	)	
<b>Revision of the Commission's Rules</b>	)	
<b>To Ensure Compatibility with Enhanced</b>	)	
<b>E911 Emergency Calling Systems</b>	)	

**To:     Wireless Telecommunications Bureau**

**Supplemental Report of Cellular Phone of Kentucky, Inc., Regarding  
Implementation of Wireless E911 Phase II Automatic Location Identification**

Cellular Phone of Kentucky, Inc., ("CPK"), hereby supplements its initial Report to the Federal Communications Commission ("Commission") identifying its plans for implementation of wireless Enhanced 911 ("E911") Phase II Automatic Location Identification ("ALI").<sup>1</sup> On December 15, 2000, Cellular Phone of Kentucky received a letter from the Commission stating that CPK had failed to identify the specific type of location technology that it would deploy, as well as, the testing verification that would be utilized. Upon receipt of the letter, CPK immediately contacted FCC Staff, as CPK believed that the letter had been mistakenly sent because CPK had stated in its November 9, 2000, filing that it intended to implement a handset-based ALI technology throughout its service territory. Staff was uncertain as to whether the letter should have been sent but suggested that CPK file a response clarifying the information presented in its November 9, 2000 filing. Accordingly, CPK requests that this letter be appended to and integrated into its November 9, 2000 Report.

On November 9, 2000, CPK filed its *E911 Phase II Carrier Implementation Report*, stating that it intended to employ a handset-based solution.<sup>2</sup> Since making the November 9, 2000 filing, CPK has continued to work towards implementation of a handset-based solution and believes that this will be the solution that is utilized.

As stated in discussions with FCC Staff, CPK had also previously included information in its November 9, 2000, filing regarding its intent to verify the performance and operation of any installed ALI solution.<sup>3</sup> However, CPK will explain further the manner in which it will test to determine the accuracy of the ALI solution in order to determine its compliance with FCC Phase II accuracy requirements. CPK intends to determine its compliance using the testing methods described in OET bulletin 71, "*Guidelines for Testing and Verifying the Accuracy of*

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<sup>1</sup> 47 C.F.R. §20.3(h).

<sup>2</sup> See, Cellular Phone of Kentucky Inc., E911 Phase II Carrier Implementation Report submitted November 9, 2000, paragraph II(a).

<sup>3</sup> See, Cellular Phone of Kentucky Inc., E911 Phase II Carrier Implementation Report submitted November 9, 2000, paragraph II(b).

*Wireless E911 Location Systems,*” as issued by the FCC on April 12, 2000. CPK intends to utilize one of the two methods of compliance verification as set forth in OET 71 bulletin. However, at this time it is difficult to make a determination as to whether it would be most suitable to utilize empirical testing in a live market or predictive modeling of specific ALI technologies using an industry accepted model that accurately represents the technology.

It is the intent of CPK to provide results which are meaningful to public safety officials as well as individuals responsible for E911 implementation. Thus, CPK will continue to work towards achieving compliance with the Commission’s E911 Phase II rules.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Dated: December 22, 2000